

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 4:19-cv-00415
ALEXANDRU BITTNER,	)	
Defendant.	)	
_____	)	

**UNITED STATES' UNOPPOSED MOTION FOR LEAVE TO  
CORRECT AND SUBSTITUTE TWO EXHIBITS**

The United States moves this Court for Leave to correct and substitute two exhibits supporting its Motion for Partial Summary Judgment (ECF #29). Upon review of the exhibits sent to the Court's Chambers and Defendant, it appears that two pages of Alexandru Bittner's deposition cited by the United States in its motion, were not included in Government Exhibit 68. Specifically pages 40 and 213 of Mr. Bittner's deposition were missing. The United States requests leave to substitute a complete set of the excerpted deposition pages for Government Exhibit 68.

Also, it appears that while the Government Exhibits 64 and 68 were uploaded, they were not highlighted. The United States moves this Court for leave to correct those exhibits with highlighting.

For the reasons stated above, the United States requests leave to correct and substitute the attached Government Exhibit 64 and Government Exhibit 68 for the previously filed Government Exhibit 64, ECF #38, and Government Exhibit 68, ECF # 43.

Defendant is not opposed to the relief sought.

Respectfully submitted,  
RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

/s/ Herbert W. Linder  
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ATTORNEYS FOR UNITED STATES

**CERTIFICATE OF CONFERENCE**

On March 13, 2020, I conferred with Rachael Rubenstein, counsel for Defendant Alexandru Bittner, regarding this motion and she stated that she was unopposed to the relief sought herein.

/s/ Herbert W. Linder  
HERBERT W. LINDER

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the foregoing motion has been made on March 13, 2020, by the Clerk's ECF filing system to:

CLARK HILL STRASBURGER  
Farley P. Katz  
Rachael Rubenstein  
2301 Broadway St.  
San Antonio, Texas 78209

/s/ Herbert W. Linder  
HERBERT W. LINDER